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CLERK US DISTRICT COURT NORTHERN DIST. OF TX FILED IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXA 2921 MAY -4 PM 2: 29 DALLAS DIVISION

UNITED STATES OF AMERICA

DEPUTY CLERK

v.

Case No. 3-21 CR0208-N

TREMELLE SYKES

INDICTMENT

The Grand Jury charges:

At all times material to this Indictment:

Counts One through Eight False Statement (Violation of 18 U.S.C. § 1001(a)(3))

- 1. From at least 2005 until 2019, the defendant, **Tremelle Sykes**, was employed as a Hazardous Material Safety Inspector for the Federal Railroad Administration ("FRA") and was the sole inspector assigned to the Dallas-Fort Worth area and northeast Texas.
- 2. The FRA was an agency of the United States Department of Transportation responsible for enforcing the regulations promulgated by the Pipeline and Hazardous Materials Safety Administration pertaining to the safe and secure transport by rail of hazardous materials, such as ethanol, crude oil, and toxic or poisonous inhalation hazard materials.
- 3. The FRA employed Hazardous Materials Safety Inspectors to conduct inspections of railroads and shippers for compliance with the hazardous material regulations. After conducting an inspection, a FRA Inspector wase required to prepare

and submit to the FRA an inspection report (Form 6180.96) that reflected his findings and provide the inspection facility with a copy of the inspection report.

4. On or about the date below for each count, in the Northern District of Texas, the defendant, **Tremelle Sykes**, in a matter within the jurisdiction of the executive branch of the Government of the United States, that is, the Federal Railroad Administration of the Department of Transportation, did knowingly and willfully make and use a false writing and document knowing the same to contain materially false, fictitious and fraudulent statements, that is, the Inspection Report (FRA Form 6180.96) identified below for each count, which represented that the defendant had performed a hazardous material inspection at the railyard company identified below, when in truth and fact, as the defendant well knew, he had not conducted the inspection:

| Count | Report Date | Report No. | Submitted Date | Railyard Company |
|-------|----------------|------------|----------------|---------------------------|
| 1 | Jan. 8, 2019 | 006 | Jan. 22, 2019 | M.G.C. (Gunter, Texas) |
| 2 | Jan. 16, 2019 | 013 | Jan. 22, 2019 | W.T. (Dallas, Texas) |
| 3 | Jan. 18, 2019 | 015 | Jan. 22, 2019 | S.C. (Garland, Texas) |
| 4 | Feb. 20, 2019 | 027 | Feb. 27, 2019 | B.E.C. (Cleburne, Texas) |
| 5 | April 9, 2019 | 055 | May 2, 2019 | S.C. (Cleburne, Texas) |
| 6 | April 11, 2019 | 057 | May 2, 2019 | Q.C. (Fort Worth, Texas) |
| 7 | May 8, 2019 | 073 | June 12, 2019 | F.W.W. (Ft. Worth, Texas) |
| 8 | June 18, 2019 | 085 | June 20, 2019 | K.R.C. (Saginaw, Texas) |

Each in violation of 18 U.S.C. § 1001(a)(3).

A TRUE BILL

FOREPERSON

PRERAK SHAH

ACTING UNITED STATES ATTORNEY

J. NICHOLAS BUNCH

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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

TREMELLE SYKES

INDICTMENT

18 U.S.C. § 1001(a)(3) False Statement

(Counts 1-8)

8 Counts

| A true bill rendered | 200 |
|--|------------|
| DALLAS | FOREPERSON |
| Filed in open court this <u></u> day of May, 2021. | |
| No Warrant Needed | |
| | |

UNITED STATES MAGISTRATE JUDGE

No Criminal Matter Pending